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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF ARIZONA**

11  
12 State of Arizona, *ex rel.* Kristin K. Mayes,  
13 Attorney General, *et al.*,

14 Plaintiffs,

15 v.

16 Michael D. Lansky, L.L.C., dba Avid  
17 Telecom, *et al.*,

18 Defendants.  
19  
20

CASE NO.: 4:23-cv-00233-TUC-CKJ  
(MAA)

**[ORAL ARGUMENT REQUESTED]**

**PLAINTIFFS' MOTION TO  
COMPEL DEFENDANT STACEY S.  
REEVES' DOCUMENT  
PRODUCTION IN RESPONSE TO  
PLAINTIFFS' FIRST SET OF  
REQUESTS FOR PRODUCTION  
OF DOCUMENTS**

21 Pursuant to Rule 37 of the Federal Rules of Civil Procedure, Plaintiff States  
22 (collectively, "Plaintiffs"), respectfully request the Court to order Defendant Stacey S.  
23 Reeves ("Reeves") to provide requested documents that she has failed to produce and/or  
24 not logged correctly under the Court's ESI Order (Dkt. #120) ("ESI Order").

25 This Motion is supported by the following Memorandum of Points and Authorities,  
26 the Declaration of Sarah Pelton and the exhibits attached thereto, any oral argument that  
27 may be heard on this issue, all other pleadings and papers on file in this action, and any  
28 other evidence that may be presented to the Court.

**GOOD FAITH CONSULTATION CERTIFICATE**

In accordance with Rule 37(a)(1) of the Federal Rules of Civil Procedure and Local Rule 7.2(j), undersigned counsel represents that prior to filing the instant Motion, Plaintiffs attempted multiple times to personally confer with Defendant Reeves’ counsel regarding its failure to respond to Plaintiffs’ Requests, but to no avail. *See* Declaration of Sarah Pelton (“Pelton Decl.”), dated January 7, 2025 at ¶¶ 11-15, 17-18, 28-29, 36-37, Exs. G-I, K, S, W. Accordingly, Plaintiffs were left with no alternative other than to file and serve this Motion.

**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. INTRODUCTION**

Plaintiffs brought this lawsuit to protect consumers from Defendant Avid Telecom – and its co-defendants Michael D. Lansky’s (“Defendant Lansky”) and Stacey S. Reeves’ – illegal telemarketing and robocall schemes. As set forth in the Complaint, Defendants Avid Telecom, Lansky and Reeves are in the business of providing Voice over Internet Protocol (“VoIP”) services, facilitating or initiating robocalls, and/or helping others make illegal robocalls – in violation of multiple state and federal laws.

On or around March 6, 2025, Plaintiffs served Defendant Reeves with the Requests seeking production of relevant and admissible evidence in Avid Telecom’s possession related to Plaintiffs’ causes of action under the Telemarketing and Consumer Fraud and Abuse Prevention Act, the Telemarketing Sales Rules, the Telephone Consumer Protection Act, the Truth in Caller ID Act, as well as other state and federal laws, and Defendants’ claimed defenses thereto. *See* Pelton Decl. at ¶ 3, Ex. A.

The Plaintiffs have met and conferred to discuss concerns with Defendant Reeves’ production and have made no progress with defense counsel. Defendant Reeves is unwilling to resolve disputes regarding Plaintiffs’ written discovery requests without court intervention. Plaintiffs insist that Defendant Reeves comply with her discovery obligations, and Defendant Reeves consistently refuses to do so. Accordingly, Defendant Reeves

1 should be compelled to provide compliant document production in response to Plaintiffs’  
2 Requests.

3  
4 **II. RELEVANT FACTS**

5 On or about March 6, 2025, Plaintiffs served Defendant Reeves with the Requests  
6 pursuant to Rule 34 of the Federal Rules of Civil Procedure. *See* Pelton Decl. at ¶ 3, Ex. A.  
7 The Requests sought documents regarding Defendant Reeves’ purported role and  
8 involvement in Defendant Avid Telecom’s conduct of transmitting illegal robocalls. *Id.* at  
9 Ex. A. The statutory deadline, April 7, 2025, came and went with no response from  
10 Defendant Reeves. *See* Fed. R. Civ. P. 34(b)(2) (“The party to whom the request is directed  
11 must respond in writing within 30 days after being served”); Pelton Decl. at ¶¶ 4-5.

12 On or around April 11, 2025, defense counsel requested to extend the deadline to  
13 April 30, 2025, in line with an extension granted to Defendant Avid Telecom’s deadline to  
14 respond. Pelton Decl. at ¶ 6, Ex. B. Plaintiffs agreed to the April 30, 2025 extension as to  
15 Defendant Reeves and stated that defense counsel should seek intervention of the Court  
16 should they require additional time. *Id.*

17 On or around April 30, 2025, defense counsel emailed Plaintiffs’ counsel stating  
18 counsel was “still working on the document responses” and unsure whether the Responses  
19 would be completed by the end of the day, but in any instance, defense counsel was “sure”  
20 the Responses would be completed by the end of the day on Friday, May 2, 2025. *Id.* at ¶  
21 7, Ex. C.

22 On or around May 2, 2025, defense counsel email served three copies of Defendant  
23 Lansky’s responses to Plaintiffs’ Requests via email. However, responses from Defendants  
24 Reeves and Avid Telecom were not included in this email. *Id.* at ¶ 8, Exs. D-E.

25 On or around May 7, 2025, Plaintiffs’ counsel emailed defense counsel requesting  
26 Defendant Reeves’ responses to Plaintiffs’ Requests. *Id.* at ¶ 9, Ex. F. Defense counsel did  
27 not respond to Plaintiffs’ May 7, 2025 correspondence. *Id.* at ¶ 10.

28 After hearing nothing further from defense counsel, on or around May 16, 2025,  
Plaintiffs’ counsel sent a meet and confer email correspondence regarding Defendant

1 Reeves' failure to respond to Plaintiffs' Requests. *Id.* at ¶ 11, Ex. G. Once again, defense  
2 counsel failed to respond to Plaintiffs' correspondence. *Id.* at ¶ 12.

3 On or around May 27, 2025, Plaintiffs' counsel again emailed defense counsel  
4 seeking his availability for a meet and confer regarding Defendant Reeves' failure to  
5 respond to Plaintiffs' Requests. *Id.* at ¶ 13, Ex. H. The following day, May 28, 2025,  
6 defense counsel emailed Plaintiffs' counsel and stated that he would try to have a  
7 "substantive response for you later today or tomorrow." *Id.* at ¶ 14, Ex. I. However, defense  
8 counsel never responded to Plaintiffs' meet and confer correspondences. *Id.* at ¶ 15.  
9 Eventually, defense counsel sent Defendant Reeves' first responses on July 21, 2025. *Id.*  
10 at ¶ 27, Exs. Q-R.

11 On or around June 19, 2025, Plaintiffs notified the Court of the dispute regarding  
12 Plaintiffs' First Set of Requests for Production. *Id.* at ¶ 16. On June 20, 2025, the Court  
13 responded by email instructing the parties to meet and confer by June 27, 2025. *Id.* at ¶ 16,  
14 Ex. J. On or around June 20, 2025, Plaintiffs' counsel emailed defense counsel to schedule  
15 a meet and confer. *Id.* at ¶ 17, Ex. K. Defense counsel did not respond to Plaintiffs'  
16 counsel's June 20, 2025 correspondence. *Id.* at ¶ 18. Plaintiffs later notified the Court of  
17 defense counsel's failure to respond. *Id.* at ¶ 19.

18 In a July 1, 2025 Order (Dkt. #118), the Court instructed the parties to meet and  
19 confer on or before July 11, 2025. *Id.* at ¶ 20, Ex. L.

20 On or around July 2, 2025, Plaintiffs emailed defense counsel asking for availability  
21 for a meet and confer. The parties scheduled a meet and confer for the following week. *Id.*  
22 at ¶ 21, Ex. M.

23 During the July 9, 2025 meet and confer and in follow-up emails between the  
24 parties, defense counsel agreed to provide Defendant Reeves' first written responses by no  
25 later than July 11, 2025. *Id.* at ¶ 22, Ex. N. Defense counsel failed to provide Defendant  
26 Reeves' written responses by the July 11, 2025 deadline. *Id.* at ¶ 23.

27 Although defense counsel did not provide Defendant Reeves's first written  
28 responses on July 11, 2025, Defendant Reeves's first production of approximately 320  
documents was produced on July 11, 2025. *Id.* at ¶ 24. The production was deficient under

1 the ESI Order because, among other things, the production was not Bates numbered and  
2 did not include an index identifying the Request to which each document corresponded.  
3 Plaintiffs' counsel notified defense counsel of these deficiencies by email on or around  
4 July 21, 2025. *Id.* at ¶ 26, Ex. P.

5 On or around July 18, 2025, defense counsel emailed Plaintiffs and acknowledged  
6 their "apparent inadvertent production of the same Responses" to Plaintiffs' First Requests  
7 for Production of Documents, issued on March 6, 2025. *Id.* at ¶ 25, Ex. O. Defense counsel  
8 promised to file supplemental responses by July 21, 2025, and asserted that "this issue has  
9 not delayed document searches...and we expect to be in a position to make additional  
10 productions shortly." *Id.*

11 On or around July 21, 2025, Plaintiffs sent defense counsel an email outlining the  
12 deficiencies with Defendant Reeves' and Defendant Lansky's document production. *Id.* at  
13 ¶ 26, Ex. P. That same day, defense counsel served Defendant Reeves's first Responses to  
14 Plaintiffs' First Requests for Production. *Id.* at ¶ 27, Exs. Q-R. Plaintiffs responded to  
15 defense counsel's email and to meet and confer regarding the deficient nature of the  
16 Responses. *Id.* at ¶ 28, Ex. S. Defense counsel did not reply. *Id.* at ¶ 29.

17 As Plaintiffs' disputes regarding Defendant Reeves' lack of production remained  
18 unresolved, Plaintiffs contacted the Court to request that discovery disputes be referred to  
19 a Magistrate. *Id.* at ¶ 30, Ex. T. In its August 11, 2025 Order (Dkt. #126), the Court set a  
20 briefing schedule to allow the parties to present their discovery disputes.

21 Defendant Reeves later reproduced her July 11, 2025 production. *Id.* at ¶ 31. After  
22 Plaintiffs informed Defendant Reeves that her production was noncompliant with the ESI  
23 Order, Defendant Reeves again reproduced her July 11, 2025 production on August 13,  
24 2025. *Id.* at ¶ 31-32, Ex. U. The August 13 reproduction addressed some of the errors  
25 previously present, but it remained noncompliant with the ESI Order because, among other  
26 things, the production did not include an index identifying the Request to which each  
27 document corresponded. Additionally, documents produced had non-contemporaneous  
28 creation dates in the metadata.

1 In its October 24, 2025 Order (Dkt. #169), the Court instructed Defendant Reeves  
2 to fully respond to the Requests and comply with the Court’s ESI Order by November 28,  
3 2025. Defendant Reeves did not provide a conforming production by that date. *Id.* at ¶ 33.  
4 Plaintiffs emailed defense counsel and notified them that Defendant Reeves had missed the  
5 Court’s November 28, 2025 deadline. *Id.* at ¶ 34, Ex. V. Defense counsel did not respond.  
6 *Id.* at ¶ 35.

7 On December 10, 2025, the parties participated in a meet and confer. During the  
8 meeting, Plaintiffs raised the issue of Defendant Reeves’ deficient document production.  
9 Defense counsel stated that a new law firm that has not entered a notice of appearance in  
10 this case—Troutman Pepper Locke—is now responsible for Defendants’ document  
11 production. *Id.* at ¶ 36, Ex. W. Defense counsel indicated they would check with the  
12 Troutman team and provide Plaintiffs’ counsel with an update. *Id.* To date, defense counsel  
13 has failed to do so. *Id.* at ¶ 37. Plaintiffs also emailed counsel at Troutman to inquire about  
14 the status of Defendant Reeves’ document production. *Id.* at ¶ 38, Ex. X. Plaintiffs have  
15 not received a response from Troutman. *Id.* at ¶ 39.

16 On or around December 12, 2025, Plaintiffs emailed defense counsel and again  
17 raised the issue of the overdue indices. *Id.* at ¶ 40, Ex. Y. Defense counsel did not respond  
18 to Plaintiffs’ correspondence. *Id.* at ¶ 41. On or around December 17, 2025, defense counsel  
19 responded to Plaintiffs’ email to Troutman, stating they expected to produce the overdue  
20 indices “sometime this week”. *Id.* at ¶ 42, Ex. Z. Defendant Reeves has still not produced  
21 the overdue document indices. *Id.* at ¶ 43.

### 22 23 **III. ARGUMENT**

24 Good cause exists to compel Defendant Reeves’ compliance with her discovery  
25 obligations. In her Responses, Defendant Reeves repeatedly asserted that she would  
26 “produce any non-privileged, responsive documents in Ms. Reeves’ possession, custody or  
27 control that are located through a reasonable search of Ms. Reeves files.” Pelton Decl. at ¶  
28 27, Ex. R. Additionally, in their responsive discovery brief, all Defendants stated they are  
not withholding any documents from production. *See* Dkt. #148 at p. 4, n. 3.

1 Defendant Reeves has made document productions to date, but the productions do  
2 not comply with the terms of the Court's ESI Order (Dkt. #120) or Rule 34 of the Federal  
3 Rules of Civil Procedure, and are thus deficient. Plaintiffs brought the issue of deficiency  
4 to Defendants multiple times with no corrections. Specifically, Plaintiffs' review identified  
5 the following deficiencies:

- 6 • In violation of Rule 34(b)(2)(B) and Section B(1)(a) of the Court's ESI Order, which  
7 required Defendant Reeves to produce all documents in her possession, custody,  
8 and control that she agreed to produce in her Responses to Plaintiffs' Requests,  
9 Defendant Reeves failed to produce responsive documents to Request Nos. 1-18,  
10 20-55, 63, 65, 81-84, 86, 89-97, 99-102. Plaintiffs have been severely prejudiced in  
11 finding relevant documents and preparing for depositions and trial due to Defendant  
12 Reeves' delay in producing these key documents.
- 13 • In violation of Rule 34(b)(2)(E)(i) and Section A(3) and Appendix A.4 of the ESI  
14 Order, which required Defendant Reeves to produce documents as they are kept in  
15 the usual course of business, Defendant Reeves' production was deficient as the  
16 documents she produced were in non-native format (e.g., Quickbooks data was  
17 produced in Excel format, rather than in its native Quickbooks format)<sup>1</sup>, contain  
18 non-contemporaneous metadata and have missing parent-child associated  
19 documents (e.g. emails with missing attachments). For example, one document  
20 brought to Defendant's attention titled "Avid Telecom Standard Rates Terms of  
21 Agreement" was created 6/22/2025, more than two years after the commencement  
22 of this action. Pelton Decl. at Ex. P. Plaintiffs are prejudiced in not having access to  
23 complete and accurate copies of documents at this late stage in the case.
- 24 • In violation of Rule 34(b)(2)(E)(i) and Section A(3) of the ESI Order, which  
25 required Defendant Reeves to organize and label produced documents to correspond  
26 to the categories in Plaintiffs' Requests, Defendant Reeves' production was  
27

28 <sup>1</sup> See *Plan Pros, Inc. v. Torczon*, No. 8:08CV136, 2009 U.S. Dist. LEXIS 92512, at \*14-  
16 (D. Neb. Sept. 18, 2009) (when Quickbooks data was produced in Excel format,  
motion to compel production of data in original Quickbooks format was granted).



deficient because she failed to label the documents in any way that corresponds to Plaintiffs' Requests. Moreover, Reeves did not provide a document index as required under paragraph 3 of the ESI Order. The ESI Order contains a document index requirement so the parties can easily identify which documents are responsive to which Requests to expedite review. Plaintiffs are prejudiced in having to sort through Defendant Reeves' document production with no indication of what documents are responsive to which Requests, which has greatly delayed identification of relevant documents to be used in party depositions.

- Defendant Reeves has produced little to no records with respect to significant customers of Avid Telecom, including but not limited to Virtual Telecom, Mobi Telecom, and Geist Telecom, entities that were discussed at length in Plaintiffs' Complaint.<sup>2</sup>
- Defendant Reeves has produced no account history logs for any of Avid Telecom's customers nor any production in response to a request seeking information related to entries on those logs.<sup>3</sup> The account history logs provide information as to customer identifiers, payments, network settings that determine call routing, call signaling and call volume capacity and the Avid representative who made changes to each<sup>4</sup>. Plaintiffs are prejudiced in not having this significant relevant information.

Plaintiffs have attempted to meet and confer with Defendants on these issues multiple times – both in writing and telephonically – to no avail. *See* Pelton Decl. at ¶¶ 11-15, 17-18, 28-29, 36-37, Exs. G-I, K, S, W. Defense counsel stated that a new law firm that has not entered a notice of appearance in this case—Troutman Pepper Locke—is responsible for Defendant Reeves' document production. *Id.* at ¶ 36, Ex. W. However, when Plaintiffs' counsel contacted Troutman to inquire about the status of Defendant Reeves' document production, counsel received no response. *Id.* at ¶¶ 38-39, Ex. X.

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<sup>2</sup> *See* Response Nos. 2, 7-9, 14, 18, 22, 25, 27-29, 31-32, 34, 36, 62-64, 66, 81, 91-94, 99-101.

<sup>3</sup> *See, e.g.*, Request No. 101.

<sup>4</sup> *See, e.g.*, Account history logs, Dkt. #45-1 at ¶ 13, Att. C.



Given the significant delay caused by Defendant Reeves' deficient document production, Plaintiffs respectfully request the Court to order Defendant Reeves to (1) provide an ESI-Order compliant index that encompasses all Requests; and (2) fix all above-identified issues with her production.

#### **IV. CONCLUSION**

For the reasons set forth above, the Plaintiffs respectfully request the Court to order Defendant Reeves to provide compliant document production to Plaintiffs' First Set of Requests for the Production of Documents.

RESPECTFULLY SUBMITTED this 7th day of January, 2026.

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 7, 2025, I caused the foregoing **PLAINTIFFS' MOTION TO COMPEL DEFENDANT STACEY S. REEVES' DOCUMENT PRODUCTION IN RESPONSE TO PLAINTIFFS' FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS** to be filed and served electronically via the Court's CM/ECF system upon counsel of record.

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